

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
	:	Case No.: 12-224(GBL)
v.	:	Trial Date: March 11, 2013
	:	
GILBERTO RAMOS,	:	
Defendant.	:	

DEFENDANT'S PROPOSED JURY VOIR DIRE

Now comes the Defendant in the above-entitled matter and moves that all prospective jurors in the above-entitled case be examined individually in the case. In such, the Defendant requests the Court proposed the following questions to all prospective jurors.

1. Are you related to any police officer?
2. If yes, is he [juror's relative] a patrolman or does he have a rank of some kind? Do you know him well? How often do you have contact with him? Do you see each other socially?
3. Do you have any friends in the police department or in any other law enforcement agencies?
4. Are you connected with any law enforcement agency?
5. Were you ever connected with any type of law enforcement agency?
6. Do you have any immediate relatives who are connected with any law enforcement agency?
7. Does your job cause you to work with the FBI or DEA?
8. Do you believe the local police should be supported? In what way?
9. Do you think the local police need any special help or support?

10. Are you affiliated with any auxiliary police organization?
11. Do you or members of your family have placards or bumper stickers on your car which say "Support your Local Police"?
12. Are you a member of any group organized principally for the suppression of crime?
13. Will you give the testimony of a police officer more credence than that of other witnesses merely because he is a police officer?
14. Do you have an opinion right now as to whether Mr. Ramos is guilty of the offenses with which he is charged?
15. In light of the fact that Mr. Ramos has been arrested in connection with this case, is it difficult for you to presume his innocence?
16. Do you believe that because a person has been charged by the government with a crime that therefore he is probably, at least, guilty of something?
17. Do you or any member of your family suffer from a drug addiction?
18. Do you have any special knowledge or training in the Spanish language?
19. Do you belong to any organization which advocate for immigration reform?
20. Do you realize that the Assistant U.S. Attorney and defense counsel are both lawyers, equal in the eyes of the law, each doing his best to represent his client?
21. Are you going to give more weight to the arguments of the prosecutor than to defense counsel merely because they bear the impressive title "Assistant U.S. Attorney"?
22. Do you now entertain any prejudice against Mr. Ramos because of the crime charged?
23. Knowing the charge against the accused, could you give him the same fair trial that you would give him if he were charged with a lesser crime?
24. If Mr. Ramos should take the stand and testify, will you judge his testimony by exactly

the same standards you use for judging the truth of the testimony of all witnesses?

25. Do you feel that because Mr. Ramos is accused of a crime, you ought to place some special qualifications on her testimony?

26. Will you consider and judge the Defendant's testimony by the same rules and standards you would use in judging the testimony of any other witness in this case?

I ASK FOR THIS:
GILBERTO RAMOS
By counsel

_____/s/_____
Robert L. Jenkins, Jr., Esq.
Bynum & Jenkins, PLLC
Virginia State Bar No.: 39161
1010 Cameron Street
Alexandria, VA 22314
(703) 309 0899 Telephone
(703) 549 7701 Fax
RJenkins@BynumAndJenkinsLaw.com
Counsel for Defendant GILBERTO RAMOS

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing motion was served on all counsel of record via ECF on MARCH 9, 2013.

_____/s/_____
Robert L. Jenkins, Jr., Esq.
Bynum & Jenkins
Virginia State Bar No.: 39161
1010 Cameron Street
Alexandria, VA 22314
(703) 309 0899 Telephone
(703) 549 7701 Fax
RJenkins@BynumAndJenkinsLaw.com
Counsel for Defendant GILBERTO RAMOS